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June 26, 2016

BY ECF

Hon. James Orenstein
Magistrate Judge
U.S. District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Janjua v. Ocwen Loan Servicing, LLC, Case No. 14-6303

Dear Judge Orenstein:

We represent defendants Ocwen Loan Servicing, LLC and Ocwen Financial Services SRL, LLC ("Defendants") in the above referenced case. We write to request that the end of fact discovery be extended by 45 days. The current fact discovery deadline is June 28, 2016 and this is our first request for an extension. We have contacted plaintiff's counsel to discuss whether he consents to our request and will alert the Court as to his response as soon as we hear back. Extending the end of fact discovery by 45 days should not impact any other scheduled deadlines.

We note that this request is being made in less than the 30-day notice period as required under this Court's Case Management and Scheduling Order. [Docket No. 18.] This request is based on the exceptional circumstance that Defendants discovered that the offer letter that is the subject of the one remaining claim in this case was sent by UPS, a third-party delivery service. This discovery was made inside the 30-day notice period. We believe it would be helpful in resolving this dispute if we could confirm certain facts about the delivery of that letter with UPS. Based on UPS's responses, additional fact discovery might be appropriate as well. We believe this can all be accomplished within an additional 45-day period and that such a request would not unduly prejudice the plaintiff.

Please let us know if you have any questions or wish to discuss further.

Respectfully submitted,

LOCKE LORD LLP

/s/ Casey B. Howard

Casey B. Howard

cc: Edward B. Geller (*by email*)